

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Evelio Rivera-Ramos
a/k/a Evelio Ramos
a/k/a Evelio Rivera

Debtor 1

Monalisa Rivera
a/k/a Mona Lisa

Debtor 2

Chapter 13

Case No. 1:18-BK-04011-HWV

Matter: Motion for Termination of Wage Attachment Order

MOTION FOR TERMINATION OF WAGE ATTACHMENT ORDER

AND NOW, come the Debtor(s), Evelio Rivera-Ramos and Monalisa Rivera, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion for Termination of Wage Attachment Order and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about September 25, 2018.
- 2) Debtor 1 receives regular income from employment with Hanover Prest-Paving Company which has been attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan.
- 3) Debtor 1 wishes to terminate this wage attachment.

WHEREFORE, Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to cease immediately this wage attachment to the Standing Chapter 13 Trustee.

Respectfully submitted,

Date: August 31, 2023

/s/ Evelio Rivera-Ramos

Debtor 1

DETHLEFS PYKOSH & MURPHY

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

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Order

ORDER OF COURT

UPON CONSIDERATION of the above-referenced Debtor(s)' Motion for Termination of Wage Attachment Order, IT IS
HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor 1 receives income should
immediately cease the wage attachment in the amount of **\$433.85** from each **bi-weekly** paycheck.

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CERTIFICATE OF SERVICE

I hereby certify that on Thursday, August 31, 2023, I served a true and correct copy of the **Debtor(s)' Motion for Termination of Wage Attachment Order and proposed Order** in this proceeding upon the following:

Via USPS First Class Mail
Hanover Prest-Paving Company
Attn: Payroll Department
5000 Hanover Road
Hanover, PA 17331

Via Electronic Means
Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Sylvia H. Rambo US Courthouse
1501 North Sixth Street, 3rd Floor
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire